

Exhibit to Declaration Under 37 C.F.R. § 1.131
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EXHIBIT A

This document contains confidential
Servicio UniTeller, Inc., information.

Date: June 14, 1999
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UniTeller Online Transaction Processing

Three slightly different models regarding the procedure for accepting transactions online are being considered. The differences between these proposals lie primarily in *how* credit card data is collected, and *at what point* in the process credit card data is collected.

Option One: The credit card number and expiration date is submitted over a phone line via touch tones to an automated computer/telephone interface. Additional credit card information, including the name of the credit card holder as it appears on the card, and the billing address, will have been submitted with the transaction information over the Internet. In this model, all of the credit card information would be processed and interpreted by the computer, with human review of information occurring whenever questionable transactions are highlighted by the computer.

Option Two: All of the credit card information, including the number, the expiration date, the name of the card holder as it appears on the card, and the billing address, is submitted over the Internet via an HTTP form. This data would be held in a pending record until the customer calls our automated system to retrieve his Folio number (i.e. his transaction identification number or claim number), at which point the information would automatically be passed to the processor for authorization. Before the information has been passed to the processor, however, it will be examined by our own system, which will check for credit cards that have exceeded their weekly limits, or for cards that have exhibited questionable usage patterns.

Option Three: The credit card number and expiration date are read over a phone line to a UniTeller operator, who would then submit that data into his computer; he would visually confirm credit card information as a way to supplement the automatic confirmation that would occur. The operator would potentially be able to visually review information so as to detect patterns pointing to fraud even before the transaction has been accepted into our system. Similar to Option One, in Option Three the customer would be entering additional credit card information (name, billing address) onto an HTML form to be submitted over the Internet.

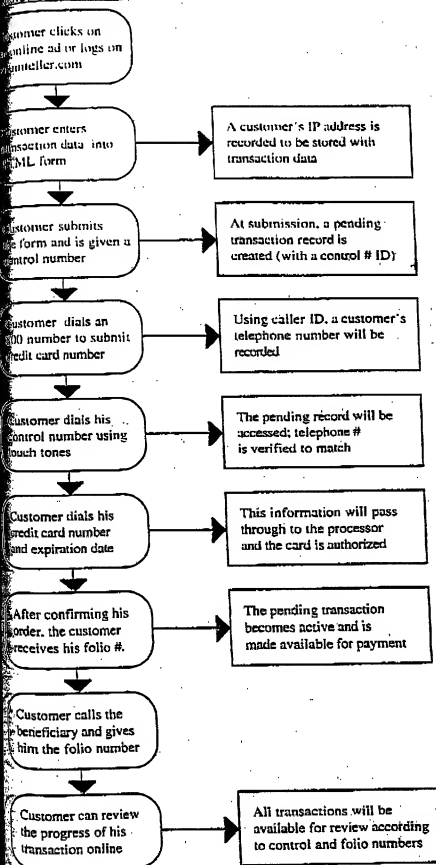
Note: An operator would contribute an additional level of fraud protection to the process; however, an operator would also introduce human error to the system (and the capital outlay required to train and hire operators capable of interpreting data patterns would possibly prove prohibitive).

The most efficient means of information review would have one or two trained individuals monitoring a compliance system. By "compliance system" I mean a segment of our database dedicated to highlighting transactions that may or may not be of questionable origin. It is to this end that IP numbers and telephone numbers must be collected.

Customer Interaction

Our Back End

Concept Description



Before initiating his online transaction, a customer will be required to review legal disclaimers describing his rights as a remitter in the various states.

IP addresses are only one piece of origination data that can be collected so as to monitor usage patterns that might point to fraud or Bank Secrecy Act violations.

Customers will also be required to submit credit card information: name and address of card holder, card type (all info except card #). This is associated with a control #.

At this point, in-coming calls will be filtered to exclude public phones, cell phones, non-U.S. phones, and blocked phones.

A customer will be required to call from the same number as appears in the transaction record. Also, when possible, address information will be matched.

The information that the customer had already submitted online will be verified along with the credit card number and expiration date.

A folio number will randomly be generated, and will be read to the customer by the computer system. The transaction is now instantly available for payment.

It is made clear to the customer that it is his/her responsibility to remember and to guard from theft his Folio number, which can be used by anyone to retrieve the funds.

One major benefit to the customer is that he can track the progress of his transaction in real time over the Internet. The customer must submit both his control number and his folio number.